



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Robert A. Parrish, Treasurer
Pat Roberts for Senate
P.O. Box 433
Great Bend, KS 67530

NOV 19 2002

Identification Number: C00128876

Reference: October Quarterly Report (7/18/02-9/30/02)

Dear Mr. Parrish:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits established by the Act. The Act precludes an individual or a political committee from making a contribution to a national party committee in excess of \$20,000 per calendar year. (2 U.S.C. §441a(a)) However, a political committee may make unlimited transfers to a national party committee if the transferred amount is determined to be and disclosed as "excess campaign funds". (11 CFR §113.1(e))

If any apparent excessive contribution in question was incompletely or incorrectly reported, you must amend your original report with the clarifying information.

If the contribution made was excessive, you must notify the recipient and request a refund of the amount in excess of \$20,000. You also must inform the Commission in writing of such a refund and provide a photocopy of any refund request sent to the recipient committee. The refund must appear on Line 15 of the Detailed Summary Page and on a supporting Schedule A of the report covering the period in which the refund is received.

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Although the Commission may take further legal action, prompt action by you to obtain a refund of the excessive contribution amount will be taken into consideration.

-Line 12 of the Detailed Summary Page discloses a transfer from a joint fundraising committee. However, the memo Schedules A supporting Line 12 are less than the amount transferred. Please note that memo Schedules A supporting a transfer from a joint fundraising committee should be greater than or equal to the amount reported on Line 12. Each participating committee shall report its share of net proceeds received from the joint fundraising committee as a transfer-in on Line 12. Each participating committee shall also file memo Schedules A itemizing its share of the gross receipts as contributions from the original donors. (11 CFR §102.17(c)(8)(B)(i)) Please amend your report to correct this discrepancy.

-On Schedule B of your report, you have itemized disbursements for which you have failed to include the full address. Please amend your report to include the missing information. (11 CFR §104.3(b)(4))

-Commission Regulations define the term "purpose" to mean a brief statement or description of why a disbursement was made. Examples are "dinner expense", "media", "salary", "polling", "travel", "party fees", "phone banks", "travel expenses", "travel expense reimbursement" and "catering costs". Examples of election day and voter registration activity include "exit polling", "door-to-door get out the vote", "get out the vote phone calls" and "driving voters to the polls". Unacceptable descriptions, which require additional clarification, include but are not limited to "advance", "consulting", "commission", "contract labor", "retainer", "election day expense", "expenses", "invoice", "support", "expense reimbursement", "miscellaneous", "professional services", "get-out-the-vote" and "voter registration". (11 CFR §104.3(b)(4)) Please amend Schedule B of your report to correct the descriptions which do not meet the requirements of the Regulations.

-Schedule A of your report discloses one or more contributions received after the primary election which are designated for the primary. These contributions may only be accepted to the extent that the committee has net debts outstanding from the primary election. (11 CFR §110.1(b)(3)(i))

A contribution is considered to be made when the contributor relinquishes control over the contribution. A contributor shall be considered to have relinquished control over the contribution when it is delivered to the

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candidate, when it is delivered to an authorized committee of the candidate, or to an agent of an authorized committee of the candidate. A contribution that is mailed to any of the aforementioned recipients will be considered to have been made on the date of the postmark. Envelopes should be retained for the committee's records. (11 CFR §110.1(b)(6))

If any contribution in question was incompletely or incorrectly reported, you must amend your original report with the clarifying information.

If one or more contributions accepted exceeds the amount of net debts outstanding from the primary election, you must refund the contribution(s) or seek redesignation of the contribution(s), in writing, from the contributor to the next election. The Commission must be notified if a refund is necessary.

The funds can be retained if within sixty (60) days of receipt, the excessive amount was properly designated for a different election, by obtaining signed written authorization from the contributor(s) pursuant to 11 CFR §110.1(b)(5) or §110.2(b)(5).

If the foregoing conditions for redesignations are not met within 60 days of receipt, the excessive amount must be refunded. See CFR §103.3(b)(1).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any refund and/ or any photocopies of letters redesignating the contributions in question. Refunds are reported on Line 20 of the Detailed Summary Page and on a supporting Schedule B of the report covering the period in which they are made. Redesignations are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation is received. (11 CFR §104.8(d)(2), (3) and (4))

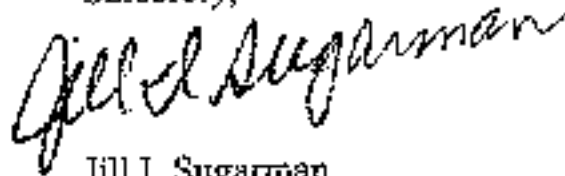
The acceptance of excessive contributions is a serious problem. Again, the committee's procedures for processing contributions should be examined and corrected in order to avoid this problem. Although the Commission may take further legal action, prompt action by you to refund or seek redesignation of the excessive amount will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Senate Public Records Office within fifteen (15) days of the date of this letter. Please contact the Senate Public Records Office at

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(202) 224-0322 for instructions on how and where to file an amendment. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Jill L. Sugarman
Senior Campaign Finance Analyst
Reports Analysis Division

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EXCESSIVE
CONTRIBUTIONS ON
THE OCTOBER QUARTERLY REPORT

P = Primary Election
G = General Election

RECIPIENT NAME	DATE	AMOUNT	ELECTION
National Republican Senatorial Cmte.	09/27/2002	25,000	G

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